

# State of Utah

## DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY

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### Title V Operating Permit

**PERMIT NUMBER: 2700010001**

**DATE OF PERMIT: January 9, 1998**

Date of Last Revision: April 10, 2002

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This Operating Permit is issued to, and applies to the following:

**Name of Permittee:**

Intermountain Power Service Corporation  
850 W Brush Wellman Rd  
Delta, UT 84624

**Permitted Location:**

Intermountain Generation Station  
850 W Brush Wellman Rd  
Delta, UT 84624-9546

**UTM coordinates:** 4,374,448 meters Northing, 364,239 meters Easting

**SIC code:** 4911

### ABSTRACT

Intermountain Generating Station consists of two coal-fired electric utility steam generating units and the ancillary facilities to support their normal operation. The units are dry bottom, wall-fired boilers with a nominal capacity of 8,500 MMBtu/hr each. The New Source Performance Standard, 40 CFR Part 60 Subpart Da applies to the two units. Both units are also Group 1, Phase II units under the Acid Rain Program (ID#, 1SGA and 2SGA). The New Source Performance Standards Subpart Y also applies to some emission units. Intermountain Generating Station is a major source of NO<sub>x</sub>, SO<sub>2</sub> and PM<sub>10</sub> and CO.

This permit is a combined Clean Air Act Title IV and Title V permit.

### UTAH AIR QUALITY BOARD

By:

Richard W. Sprott, Executive Secretary

Prepared By:

Jennifer He

### Operating Permit History

|                            |   |  |
|----------------------------|---|--|
| 1/9/1998 - Permit issued   | Action initiated by an initial operating permit application           |  |
| 7/14/1998 -Permit modified | Action initiated by a reopening of an operating permit for cause      | to modify Provision I.U.1 of the permit to reference the inventory rule directly.  |
| 2/25/2000 -Permit modified | Action initiated by an administrative amendment (initiated by source) | Correct tank size in condition II.A.71 Mobile Oil Storage Tanks, which says 5,000 - 10,000 gallons, it should say 5,000 to 12,000 gallons. |
| 11/5/2001 -Permit modified | Action initiated by an administrative amendment (initiated by source) | due to consolidate Approval Order (DAQE-749-01) issued on September 7, 2001.   |
| 4/10/2002 -Permit modified | Action initiated by an administrative amendment (initiated by DAQ)    | due to issuance of enhanced AO DAQE-049-02 for modification of main boilers to increase heat input   |

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**Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.**

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

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**Section I: GENERAL PROVISIONS**

**I.A. Federal Enforcement.**

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

**I.B. Permitted Activity(ies).**

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

**I.C. Duty to Comply.**

I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))

I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))

I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))

I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

I.D. **Permit Expiration and Renewal.**

I.D.1 **This permit is issued for a fixed term of five years and expires on January 9, 2003.** (R307-415-6a(2))

I.D.2 Application for renewal of this permit is due by January 9, 2002. An application may be submitted early for any reason. (R307-415-5a(1)(c))

I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

I.E. **Application Shield.**

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

I.F. **Severability.**

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

I.G. **Permit Fee.**

I.G.1 The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

**I.H. No Property Rights.**

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

**I.I. Revision Exception.**

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

**I.J. Inspection and Entry.**

I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:

I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))

I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))

I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))

I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))

I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

**I.K. Certification.**

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

**I.L. Compliance Certification.**

I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than March 1, 1999 and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))

- I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;
- I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;
- I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.
- I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Office of Enforcement, Compliance and Environmental Justice  
(mail code 8ENF)  
EPA, Region VIII  
999 18th Street, Suite 300  
Denver, CO 80202-2466

**I.M. Permit Shield.**

- I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:
- I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))
- I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))
- I.M.2 Nothing in this permit shall alter or affect any of the following:
- I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))



- I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))
- I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))
- I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))
- I.N. **Emergency Provision.**
- I.N.1 An “emergency” is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))
- I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))
- I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))
- I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))
- I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))
- I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))
- I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))

**I.O. Operational Flexibility.**

Operational flexibility is governed by R307-415-7d(1).

**I.P. Off-permit Changes.**

Off-permit changes are governed by R307-415-7d(2).

**I.Q. Administrative Permit Amendments.**

Administrative permit amendments are governed by R307-415-7e.

**I.R. Permit Modifications.**

Permit modifications are governed by R307-415-7f.

**I.S. Records and Reporting.**

**I.S.1 Records.**

**I.S.1.a** The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))

**I.S.1.b** For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))

**I.S.1.b.1** The date, place as defined in this permit, and time of sampling or measurement.

**I.S.1.b.2** The date analyses were performed.

**I.S.1.b.3** The company or entity that performed the analyses.

**I.S.1.b.4** The analytical techniques or methods used.

**I.S.1.b.5** The results of such analyses.

**I.S.1.b.6** The operating conditions as existing at the time of sampling or measurement.

**I.S.1.c** Additional record keeping requirements, if any, are described in Section II, Special Provisions.

**I.S.2 Reports.**

- I.S.2.a Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))
- I.S.2.b All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))
- I.S.2.c The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. **Prompt, as used in this condition, shall be defined as written notification within 14 days.** Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))

I.S.3 Notification Addresses.

- I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:

Utah Division of Air Quality  
P.O. Box 144820  
Salt Lake City, UT 84114-4820  
Phone: 801-536-4000

- I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:

For annual compliance certifications

Environmental Protection Agency, Region VIII  
Office of Enforcement, Compliance and  
Environmental Justice (mail code 8ENF)  
999 18th Street, Suite 300  
Denver, CO 80202-2466

For reports, notifications, or other correspondence  
related to permit modifications, applications, etc.

Environmental Protection Agency, Region VIII  
Office of Partnerships & Regulatory Assistance  
Air & Radiation Program (mail code 8P-AR)  
999 18th Street, Suite 300  
Denver, CO 80202-2466  
Phone: 303-312-6440

I.T. **Reopening for Cause.**

- I.T.1 A permit shall be reopened and revised under any of the following circumstances:

- I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the

requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))

I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))

I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))

I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))

I.T.1.e Additional requirements, including excess emissions requirements, become applicable to an Title IV affected source under the Acid Rain Program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into this permit. (R307-415-7g(1)(b)) To be deleted unless a Title IV source.

I.T.2 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

I.U. **Inventory Requirements.**

I.U.1 An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

I.U.2 A Hazardous Air Pollutant Inventory shall be submitted in accordance with the procedures of R307-155, Hazardous Air Pollutant Inventory. (R307-155)

I.V. **Title IV and Other, More Stringent Requirements**

Where an applicable requirement is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, Acid Deposition Control, both provisions shall be incorporated into this permit. (R307-415-6a(1)(b))

## **Section II: SPECIAL PROVISIONS**

### **II.A. Emission Unit(s) Permitted to Discharge Air Contaminants.**

(R307-415-4(3)(a) and R307-415-4(4))

- II.A.1      **Unit #1 Coal-fired Boiler** (designated as Emission unit #1)  
Unit Description: rated at 8,500 MMBtu/hr before modification or at 9,225 MM Btu/hr after modification, fired on bituminous & subbituminous coal using diesel or natural gas during startup, shutdown, upsets, & flame stabilization, equipped with low-NOx burners, bag house, and FGD scrubber
- II.A.2      **Unit #2 Coal-fired Boiler** (designated as Emission unit #2)  
Unit Description: rated at 8,500 MMBtu/hr before modification or at 9,225 MM Btu/hr after modification, fired on bituminous & subbituminous coal using diesel or natural gas during startup, shutdown, upsets, & flame stabilization, equipped with low-NOx burners, bag house, and FGD scrubber
- II.A.3      **Main Boilers** (designated as Emission unit #1 and 2)  
Unit Description: Include emission unit 1 and 2
- II.A.4      **Coal Car Unloading Dust Collector 1A** (designated as Emission unit #3)  
Unit Description: rated at 73,500 cfm with an air to cloth ratio of 6.4 : 1
- II.A.5      **Coal Car Unloading Dust Collector 1B** (designated as Emission unit #4)  
Unit Description: rated at 73,500 cfm with an air to cloth ratio of 6.4 : 1
- II.A.6      **Coal Car Unloading Dust Collector 1C** (designated as Emission unit #5)  
Unit Description: rated at 73,500 cfm with an air to cloth ratio of 6.4 : 1
- II.A.7      **Coal Car Unloading Dust Collector 1D** (designated as Emission unit #6)  
Unit Description: rated at 73,500 cfm with an air to cloth ratio of 6.4 : 1
- II.A.8      **Coal Truck Unloading Dust Collector 2** (designated as Emission unit #7)  
Unit Description: rated at 6,000 cfm with an air to cloth ratio of 6.12 : 1
- II.A.9      **Coal Reserve Reclaim Dust Collector 3** (designated as Emission unit #8)  
Unit Description: rated at 8,000 cfm with an air to cloth ratio of 5.44 : 1
- II.A.10     **Coal Transfer Building #1 Dust Collector 4** (designated as Emission unit #9)  
Unit Description: rated at 34,000 cfm with an air to cloth ratio of 6.4 : 1
- II.A.11     **Coal Transfer Building #2 Dust Collector 5** (designated as Emission unit #10)  
Unit Description: rated at 26,000 cfm with an air to cloth ratio of 6.29 : 1
- II.A.12     **Coal Transfer Building #4 Dust Collector 6** (designated as Emission unit #11)  
Unit Description: rated at 17,500 cfm with an air to cloth ratio of 6.3 : 1
- II.A.13     **Coal Crusher Building Dust Collector 11** (designated as Emission unit #12)  
Unit Description: rated at 18,000 cfm with an air to cloth ratio of 6.53 : 1
- II.A.14     **U1 Generation Building Coal Dust Collector 13A** (designated as Emission unit #13)  
Unit Description: rated at 33,000 cfm with an air to cloth ratio of 6.25 : 1
- II.A.15     **U1 Generation Building Coal Dust Collector 13B** (designated as Emission unit #14)  
Unit Description: rated at 16,500 cfm with an air to cloth ratio of 5.99 : 1
- II.A.16     **U2 Generation Building Coal Dust Collector 14A** (designated as Emission unit #15)  
Unit Description: rated at 19,500 cfm with an air to cloth ratio of 6.5 : 1
- II.A.17     **U2 Generation Building Coal Dust Collector 14B** (designated as Emission unit #16)  
Unit Description: rated at 16,500 cfm with an air to cloth ratio of 5.99 : 1

- II.A.18 **Coal Pile Active and Reserve** (designated as Emission unit #17)  
Unit Description: The active pile has an unsealed portion and the reserve pile has a sealed portion
- II.A.19 **Coal Stackout** (designated as Emission unit #18)  
Unit Description: includes active reclaim and reserve reclaim stacker areas
- II.A.20 **Fuel Oil Tank 1A\*** (designated as Emission unit #19)  
Unit Description: 675,000 gallons, installed in 1981
- II.A.21 **Fuel Oil Tank 1B\*** (designated as Emission unit #20)  
Unit Description: 675,000 gallons, installed in 1981
- II.A.22 **Limestone Unloading Dust Collector 1A** (designated as Emission unit #21)  
Unit Description: rated 6,250 cfm with an air to cloth ratio of 5.2 : 1
- II.A.23 **Limestone Unloading Dust Collector 1B** (designated as Emission unit #22)  
Unit Description: rated 6,250 cfm with an air to cloth ratio of 5.2 : 1
- II.A.24 **Limestone Transfer Dust Collector 1** (designated as Emission unit #23)  
Unit Description: rated 4,000 cfm with an air to cloth ratio of 5.45 : 1
- II.A.25 **Limestone Reclaim Dust Collector 2** (designated as Emission unit #24)  
Unit Description: rated 8,000 cfm with an air to cloth ratio of 5.45 : 1
- II.A.26 **Limestone Silo Bin Vent Filter** (designated as Emission unit #25)  
Unit Description: rated at 750 cfm with an air to cloth ratio of 2.2 : 1
- II.A.27 **Limestone Crusher Dust Collector 3** (designated as Emission unit #26)  
Unit Description: rated 6,000 cfm with an air to cloth ratio of 6.12 : 1
- II.A.28 **Limestone Preparation Dust Collector 4** (designated as Emission unit #27)  
Unit Description: rated 16,500 cfm with an air to cloth ratio of 5.99 : 1
- II.A.29 **Limestone Storage Pile** (designated as Emission unit #28)  
Unit Description: a long term storage reserve
- II.A.30 **Lime Silo Dust Collector 1** (designated as Emission unit #29)  
Unit Description: rated at 1,200 cfm with an air to cloth ratio of 4.1 : 1
- II.A.31 **Lime Hopper Dust Collector 2** (designated as Emission unit #30)  
Unit Description: rated at 1,200 cfm with an air to cloth ratio of 3.8 : 1
- II.A.32 **Soda Ash Silo Dust Collector 3** (designated as Emission unit #31)  
Unit Description: rated at 1,200 cfm with an air to cloth ratio of 4.1 : 1
- II.A.33 **Soda Ash Hopper Dust Collector 4** (designated as Emission unit #32)  
Unit Description: rated at 1,200 cfm with an air to cloth ratio of 3.8 : 1
- II.A.34 **Fly Ash Silo Bin Vent Filter 1A** (designated as Emission unit #33)  
Unit Description: rated at 4,845 cfm with an air to cloth ratio of 3 : 1
- II.A.35 **Fly Ash Silo Bin Vent Filter 1B** (designated as Emission unit #34)  
Unit Description: rated at 4,845 cfm with an air to cloth ratio of 3 : 1
- II.A.36 **Combustion Byproducts Stackout & Stockpile** (designated as Emission unit #35)  
Unit Description: includes a main and an emergency storage areas for conditioned sludge
- II.A.37 **Combustion Byproduct Landfill** (designated as Emission unit #36)  
Unit Description: conditioned sludge landfill
- II.A.38 **Unit 1 Cooling Tower 1A** (designated as Emission unit #37)  
Unit Description: evaporative cooling tower
- II.A.39 **Unit 1 Cooling Tower 1B** (designated as Emission unit #38)  
Unit Description: evaporative cooling tower

- II.A.40      **Unit 2 Cooling Tower 1A** (designated as Emission unit #39)  
Unit Description: evaporative cooling tower
- II.A.41      **Unit 2 Cooling Tower 1B** (designated as Emission unit #40)  
Unit Description: evaporative cooling tower
- II.A.42      **Coal Sample Preparation Building Dust Collector** (designated as Emission unit #41)  
Unit Description: rated at 8,610 cfm with 16 filter bags
- II.A.43      **Sandblast Facility Dust Collector** (designated as Emission unit #42)  
Unit Description: rated at 24,000 cfm with air to cloth ratio of 6.1:1
- II.A.44      **U1 Gen. Bldg. Vacuum Cleaning Dust Collector** (designated as Emission unit #43)  
Unit Description: having capacity of 10 cubic yards with air to cloth ratio of 3 :1
- II.A.45      **U2 Gen. Bldg. Vacuum Cleaning Dust Collector** (designated as Emission unit #44)  
Unit Description: having capacity of 10 cubic yards with air to cloth ratio of 3 :1
- II.A.46      **U1 Fabric Filter Vacuum Cleaning Dust Collector** (designated as Emission unit #45)  
Unit Description: having capacity of 3 cubic yards with air to cloth ratio of 3 :1
- II.A.47      **U2 Fabric Filter Vacuum Cleaning Dust Collector** (designated as Emission unit #46)  
Unit Description: having capacity of 3 cubic yards with air to cloth ratio of 3 :1
- II.A.48      **GSB Vacuum Cleaning Dust Collector** (designated as Emission unit #47)  
Unit Description: having capacity of 3 cubic yards with air to cloth ratio of 3 :1
- II.A.49      **Guzzler Truck Dust Collector** (designated as Emission unit #48)  
Unit Description: Guzzler has a capacity of 18 cubic yards and collector is rated at 5,350 cfm with an air to cloth ratio of 11.08 :1, truck mounted vacuum cleaning system
- II.A.50      **Emergency Diesel Generators** (designated as Emission unit #49)  
Unit Description: includes Generators 1A, 1B and 1C each equipped with a 4,000 HP diesel engine
- II.A.51      **Class III Industrial Waste Landfill** (designated as Emission unit #50)  
Unit Description: handles most of trash and garbage generated on site
- II.A.52      **Paved Haul Road** (designated as Emission unit #51)  
Unit Description: used for coal and limestone transportation
- II.A.53      **Haul Road and Access Road** (designated as Emission unit #52)  
Unit Description: used for combustion byproducts and sanitary Landfills
- II.A.54      **Solvent Washers\*** (designated as Emission unit #53)  
Unit Description: Each contains approximately 30 gallons of nonhalogenated solvent with a covered wash basin
- II.A.55      **Diesel Driven Fire Pump 1B** (designated as Emission unit #54)  
Unit Description: engine rated at 290 HP
- II.A.56      **Diesel Driven Fire Pump 1C** (designated as Emission unit #55)  
Unit Description: engine rated at 290 HP
- II.A.57      **Auxiliary Boiler 1A** (designated as Emission unit #56)  
Unit Description: rated at 166 MMBtu/hr and fired on No. 2 fuel oil and constructed on January 26, 1984
- II.A.58      **Auxiliary Boiler 1B** (designated as Emission unit #57)  
Unit Description: rated at 166 MMBtu/hr and fired on No. 2 fuel oil and constructed on January 26, 1984
- II.A.59      **Auxiliary Boilers** (designated as Emission unit #56 and 57)  
Unit Description: include Emission unit 56 and 57.

- II.A.60 **Coal Conveyers** (designated as Emission unit #58)  
Unit Description: includes belts 1A, 1B, 2A, 2B, 4, 5A, 5B, 7, 8, 9A, 9B, 15A, 15B, 18A, 18B and 30.
- II.A.61 **Dust Collector Group 1** (designated as Emission unit #Group 1)  
Unit Description: includes Emission units 3, 4, 5, 6, 9, 10, 11, 12, 13, 14, 15, 16, and 27
- II.A.62 **Dust Collector Group 2** (designated as Emission unit #Group 2)  
Unit Description: includes emission units 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 21, 22, 23, 24, 25, 26, 27, 29, 30, 31, 32, 33, 34, 41, 42, 43, 44, 45, 46, 47, and 48
- II.A.63 **Paint Booth/Shops\*** (designated as Emission unit #59)  
Unit Description: used for small equipment painting, non-architectural painting on-site, and auto painting
- II.A.64 **Engine Driven Equipment\*** (designated as Emission unit #60)  
Unit Description: Includes miscellaneous compressors, generators, hydraulic pumps and diesel fire pumps
- II.A.65 **Coal Truck Receiving Grating\*** (designated as Emission unit #61)  
Unit Description: covers the coal truck unloading hopper
- II.A.66 **Bulb Recycling Crusher\*** (designated as Emission unit #62)  
Unit Description: crushes waste fluorescent lamps on-site
- II.A.67 **Laboratory Fume Hoods\*** (designated as Emission unit #63)  
Unit Description: for testing water, oil, coal and miscellaneous samples
- II.A.68 **Gasoline Tank\*** (designated as Emission unit #64)  
Unit Description: used to fuel vehicles at the Converter Station (500 gallons), installed in 1981
- II.A.69 **Diesel Tank\*** (designated as Emission unit #65)  
Unit Description: feeds the emergency diesel generators (10,000 gallon), installed in 1981
- II.A.70 **Diesel Day Tanks\*** (designated as Emission unit #66)  
Unit Description: contains diesel fuel for the Emergency Diesel Generators and Emergency diesel fire pumps (largest is 560 gallon), installed in 1981
- II.A.71 **Mobile Oil Storage Tanks\*** (designated as Emission unit #67)  
Unit Description: used as temporary storage for dielectric oil (5,000 -12,000 gallon), installed in 1981
- II.A.72 **Turbine Lube Oil Unit\*** (designated as Emission unit #68)  
Unit Description: used to store turbine lube oil (up to 40,000 gallons per unit), installed in 1981
- II.A.73 **Underground Storage Diesel Tank\*** (designated as Emission unit #69)  
Unit Description: non-commercial onsite fueling (20,000 gallons), installed in 1981
- II.A.74 **Underground Storage Gasoline Tank\*** (designated as Emission unit #70)  
Unit Description: non-commercial onsite fueling (6,000 gallons), installed in 1981
- II.A.75 **Used Oil Tank\*** (designated as Emission unit #71)  
Unit Description: 10,000 gallons, installed in 1981
- II.A.76 **Cooling Towers** (designated as Emission unit #72)  
Unit Description: Two evaporative helper cooling towers. No unit-specific applicable requirements.

II.B. **Requirements and limitations.**



The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated: (R307-415-6a(1))

II.B.1 **Conditions on permitted source (Source-wide):**

II.B.1.a The permittee shall not discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three minutes in any one hour which is a shade or density darker than 40% opacity. [Authority granted under R307-206; condition originated in R307-206]

II.B.1.a.1 **Monitoring:** Visible emission evaluation shall be conducted every six months if abrasive blasting operations are conducted. Visible emission evaluation of abrasive blasting operations shall be conducted in accordance with the following provisions:

a. Emissions from unconfined blasting shall be read at the densest point of the emission after a major portion of the spent abrasive has fallen out, at a point not less than five feet nor more than twenty-five feet from the impact surface from any single abrasive blasting nozzle.

b. Emissions from unconfined blasting employing multiple nozzles shall be judged as a single source unless it can be demonstrated by the owner or operator that each nozzle, evaluated separately, meets the emission and performance standards provided for in R307-206.

c. Emissions from confined blasting shall be read at the densest point after the air contaminant leaves the enclosure.

II.B.1.a.2 **Recordkeeping:** Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.

II.B.1.a.3 **Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.b Emissions from sources of fugitive dust shall be minimized. The permittee shall develop and implement a fugitive dust control plan, approved by the Executive Secretary, that minimizes fugitive dust. Compliance shall be based on the permittee adhering to the approved fugitive dust control plan. Natural sources of dust and fugitive emissions are not fugitive dust within the meaning of this condition.

a. Contents of Fugitive Dust Control Plan. The fugitive dust control plan shall address fugitive dust sources including, but not limited to: material storage; material handling; material processing; roads, both paved and unpaved; loading; dumping; hauling; and operation areas. Control measures listed for all source categories in R307-12 shall be considered.

b. Use of Multiple Levels of Control. The plan shall describe multiple levels of fugitive dust control for each fugitive dust source or fugitive dust-generating activity. The first level describes the minimum level of fugitive control, while the next levels describe control methods that are progressively more stringent. If a fugitive dust observation is made that exceeds the monitoring indicator for the plan, the fugitive dust control level shall be increased to the next most stringent control level. If a fugitive dust observation meets the monitoring indicator for the plan, the fugitive dust control level may be maintained at its current level or may be relaxed to the next less stringent level if indicators are not likely to be exceeded.

c. **Monitoring.** The plan shall describe visual indicators that will be used to determine the appropriate level of control to minimize fugitive dust for each source of dust. Procedures on how variations are made and documented shall be addressed.

d. **Revision of the Plan.** The Executive Secretary may require revision of the fugitive dust control plan if it is determined that the plan is not effective from visual observations, citizen complaints, or other means. The permittee may also request revisions to the plan. Revisions to the plan do not require renewal of this permit but must be submitted to, and approved by, the Executive Secretary. [Authority derived under R307-12-3 and R307-415-6c(1); condition originated in DAQE-049-02]

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| II.B.1.b.1 | <b>Monitoring:</b>    | <p>a. Records that document actions taken to implement the fugitive dust control plan shall also serve as monitoring.</p> <p>b. The permittee shall perform periodic visual observations of each source of fugitive dust as described in the fugitive dust control plan.</p>   |
| II.B.1.b.2 | <b>Recordkeeping:</b> | <p>a. Records of all actions taken to implement the fugitive dust control plan shall be maintained and include the date and time the action was taken.</p> <p>b. Results of fugitive dust observations shall be maintained for five years and as described in the fugitive dust control plan.</p>  |
| II.B.1.b.3 | <b>Reporting:</b>     | There are no reporting requirements for this provision except those specified in Section I of this permit.   |
| II.B.1.c   |                       | At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any permitted plant equipment, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [Authority granted under R307-401-5 and 40 CFR 60.11(d); condition originated in DAQE-049-02] |
| II.B.1.c.1 | <b>Monitoring:</b>    | Records required for this permit condition will serve as monitoring.   |
| II.B.1.c.2 | <b>Recordkeeping:</b> | Records documenting scheduled and unscheduled maintenance shall be maintained. A copy of all manufacturers' instructions, established operating instructions, or established maintenance practices for pollution control equipment and pollution emitting equipment shall be kept on site. These instructions shall be available to all employees who operate the equipment and shall be made available to compliance inspectors upon their request.   |
| II.B.1.c.3 | <b>Reporting:</b>     | <p>In addition to the reports required in Section I of this permit, the following reports shall be submitted:</p> <p>a. An annual projection of planned outages for steam boilers and associated pollution control equipment shall be submitted to the Executive Secretary not later than January 30 for each calendar year.</p>   |

b. Changes to the schedule of planned outages shall be reported to the Executive Secretary within 96 hours after the start of the outage.

c. Maintenance outages shall be reported promptly or according to other applicable reporting criteria in Provision I.S.

II.B.1.d A Risk Management Plan (RMP) developed in accordance with 40 CFR 68 shall be registered with the United States Environmental Protection Agency (USEPA) by June 21, 1999. [Authority granted under 40 CFR 68; condition originated in 40 CFR 68]

II.B.1.d.1 **Monitoring:** A copy of the Risk Management Plan shall be available upon request along with a copy of the transmittal letter to EPA.

II.B.1.d.2 **Recordkeeping:** A copy of the Risk Management Plan shall be available to the Executive Secretary upon request along with a copy of the transmittal letter to EPA.

II.B.1.d.3 **Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.e Sulfur content of the fuel oil combusted shall be no greater than 0.85 lb/MMBtu heat input. [Authority granted under R307-203-1; condition originated in DAQE-049-02]

II.B.1.e.1 **Monitoring:** Compliance with this limitation shall be determined either by testing the fuel monthly for the following specifications: 1) Weight Percent Sulfur 2) Gross Heating Value (Btu per unit volume) and 3) Density; by inspection of these specifications as provided by the vendor for each delivery of fuel; or by direct vendor certification that all deliveries have met the sulfur content limit. All specifications shall be ascertained in accordance with methods of American Society for Testing and Materials.

Sulfur content in lbs/MMBtu shall be determined by the following equation:

$$S \text{ lbs/MMBtu} = [(\text{Weight percent sulfur}/100) \times \text{Density (lb/gal)}] / [(\text{gross heating value (Btu/gal)}) \times (1 \text{ MMBtu}/1,000,000 \text{ Btu})]$$

II.B.1.e.2 **Recordkeeping:** Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.

II.B.1.e.3 **Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.f The permittee shall comply with the applicable requirements for servicing of motor vehicle air conditioners pursuant to 40 CFR 82, Subpart B - Servicing of Motor Vehicle Air Conditioners. [Authority granted under 40 CFR 82.30(b); condition originated in 40 CFR Part 82 Subpart B]

II.B.1.f.1 **Monitoring:** The permittee shall certify, in the annual compliance statement required in Section I of this permit, its compliance status with the requirements of 40 CFR 82, Subpart B.

II.B.1.f.2 **Recordkeeping:** All records required in 40 CFR 82, Subpart B shall be maintained consistent with the requirements of Provision S.1 in Section I of this permit.

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| II.B.1.f.3 | <b>Reporting:</b>  | All reports required in 40 CFR 82, Subpart B shall be submitted as required. There are no additional reporting requirements except as outlined in Section I of this permit.   |
| II.B.1.g   |  | The permittee shall comply with the applicable requirements for recycling and emission reduction for class I and class II refrigerants pursuant to 40 CFR 82, Subpart F - Recycling and Emissions Reduction. [Authority granted under 40 CFR 82.150(b); condition originated in 40 CFR Part 82 Subpart F]   |
| II.B.1.g.1 | <b>Monitoring:</b>   | The permittee shall certify, in the annual compliance statement required in Section I of this permit, its compliance status with the requirements of 40 CFR 82, Subpart F.  |
| II.B.1.g.2 | <b>Recordkeeping:</b>  | All records required in 40 CFR 82, Subpart F shall be maintained consistent with the requirements of Provision S.1 in Section I of this permit.   |
| II.B.1.g.3 | <b>Reporting:</b>  | All reports required in 40 CFR 82, Subpart F shall be submitted as required. There are no additional reporting requirements except as outlined in Section I of this permit.   |
| II.B.1.h   |  | The permittee may fuel-blend self-generated used oil with coal at the active coal pile reclaim structure. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]   |
| II.B.1.h.1 | <b>Monitoring:</b>   | No monitoring is required unless the contaminant character of the used oil changes.   |
| II.B.1.h.2 | <b>Recordkeeping:</b>  | The record of the contaminant character of the used oil shall be maintained.  |
| II.B.1.h.3 | <b>Reporting:</b>  | There are no reporting requirements for this provision except those specified in Section I of this permit.  |
| II.B.1.i   |  | Emissions of CO shall be no greater than 1989.6 tons per rolling 12-month period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]   |
| II.B.1.i.1 | <b>Monitoring:</b>   | Within the first 20 days of each month, CO emissions total shall be calculated for each calendar month and added to the previous 11 months emissions data resulting a 12-month rolling total. Emission factors for CO shall be derived from the most recent EPA's Compilation of Air Pollutant Emission Factors (AP-42), industry specific published emission factors [such as Electric Power Research Institute, Edison Electric Institute), fuel analysis, and IPSC own testing as appropriate. |
| II.B.1.i.2 | <b>Recordkeeping:</b>  | Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.   |
| II.B.1.i.3 | <b>Reporting:</b>  | There are no reporting requirements for this provision except those specified in Section I of this permit.  |
| II.B.2     | <b><u>Conditions on Main Boilers (Emission unit #1 and 2):</u></b> |   |
| II.B.2.a   |  | Emissions of NOx shall be no greater than 0.50 lb/MMBtu heat input before modification or no greater than   |

0.461 lb/MMBtu heat input after modification, based on a 30-day rolling average as determined by the arithmetic average of all hourly emission rates for the 30 successive boiler operating days for each boiler except during periods of startup, shutdown, maintenance/planned outage or malfunction. Modification is defined in the abstract of DAQE-049-02. [Authority granted under 40 CFR 60.44a and 60.46a; condition originated in DAQE-049-02]

II.B.2.a.1

**Monitoring:**

a. The permittee shall install, calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring nitrogen oxides emissions. The permittee shall determine compliance in accordance with 40 CFR Part 60.46a, Compliance provision (subparagraphs (b), (c), (e), (g) and (h), 60.47a, Emission monitoring (subparagraphs (c), (d), (e), (f), (g), (h), (i), and (j)), and 60.48a, Compliance determination procedures and methods (subparagraph (d)).

b. Each continuous emission monitoring system shall meet the following requirements:

- 40 CFR Part 75 Appendix A, Specification and Test Procedures,
  - 1. Installation and Measurement Location
  - 2. Equipment Specifications (except the requirement for a low range in 2.1.1.2)
  - 3. Performance Specifications
  - 4. Data Acquisition and Handling Systems
  - 5. Calibration Gas

c. The permittee shall implement a Quality Control program according to 40 CFR Part 75 Appendix B, Procedure 1, Quality Control Program, and Appendix B, Procedure 2, Frequency of Testing, except Procedure 2.1.5, Procedure 2.2.3 and Procedure 2.3.2, which define the out-of-control periods for the daily, quarterly, semiannual and annual assessments, respectively. The following requirements shall be used to define the out-of-control criteria for the emission data:

40 CFR Part 60, Appendix F, Procedure 4.3, Criteria for Excessive Calibration Drift

40 CFR Part 60, Appendix F, Procedure 5.2, Excessive Audit Inaccuracy

40 CFR Part 60, Appendix F, Procedure 6, Calculations for CEMS Data Accuracy

II.B.2.a.2

**Recordkeeping:**

a. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by applicable portions of 40 CFR Part 60, Subparts A and Da recorded in a permanent form suitable for inspection. (40 CFR 60.7(f))

b. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the unit; any malfunction of the air pollution control equipment; or any periods during which

a continuous monitoring system or monitoring device is inoperative (40 CFR 60.7(b)). (origin: 40 CFR 60.7(b) & (f) and R307-415-6a(3)(b)(ii))

II.B.2.a.3

**Reporting:**

- a. The permittee shall submit excess emission reports required by 40 CFR 60.7(c) and (d) and 40 CFR 60.49a, Reporting requirements. A data assessment report required by Appendix F, Procedure 1, Section 7 to 40 CFR Part 60 shall be submitted with the excess emission report.
- b. Relative Accuracy Test Audit notifications shall be made in accordance with R307-170, Continuous Emission Monitoring System Program.
- c. The permittee shall submit notifications and reports to the Executive Secretary as required by R307-170, Continuous Emission Monitoring Systems Program.
- d. A copy of all reports required by 40 CFR Part 60 to be submitted to the Executive Secretary (permitting authority) shall also be submitted to USEPA, Region VIII, if requested. (40 CFR 60.4 and 60.7(c))
- e. The reports required in paragraphs a, b, and c above are considered prompt notification of permit deviations required in provision I.S.2.c of this permit if all information required by provision I.S.2.c is included in the report.
- f. Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107.

II.B.2.b

Emissions of PM<sub>10</sub> shall not be greater than 0.02 lb/MMBtu heat input before modification or no greater than 0.0184 lb/MMBtu after modification, for each boiler except during periods of startup, shutdown, maintenance/planned outage or malfunction. Modification is defined in the abstract of DAQE-049-02. [Authority granted under 40 CFR 60.42a(a), 60.46a(c) and R307-401-6 (BACT); condition originated in DAQE-049-02]

II.B.2.b.1

**Monitoring:**

Stack testing shall be performed as specified below:

- (a) Frequency. Emissions shall be tested annually, based on the date of the most recent stack test. The source may also be tested at any time if directed by the Executive Secretary.
- (b) Notification. At least 30 days before the test, the source shall notify the Executive Secretary of the date, time, and place of testing and provide a copy of the test protocol. The source shall attend a pretest conference if determined necessary by the Executive Secretary.
- (c) Methods.
  - (1) Sample Location - the emission point shall conform to the requirements of 40 CFR 60, Appendix A, Method 1, and Occupational Safety and Health Administration (OSHA) approved access shall be provided to the test location.

(2) For stacks in which no liquid drops are present, the following methods shall be used: 40 CFR 51, Appendix M, Methods 201 or 201a. Method 202 may be used to measure condensible particulate matter.

(3) For stacks in which liquid drops are present, methods to eliminate the liquid drops should be explored. If no reasonable method to eliminate the drops exists, then the following methods shall be used: 40 CFR 60, Appendix A, Method 5, 5a, 5d, or 5e as appropriate. The back half condensibles shall also be tested using a method specified by the Executive Secretary. All particulate captured shall be considered PM10.

(4) The back half condensibles shall not be used for compliance demonstration but shall be used for inventory purposes.

(d) Calculations. To determine mass emission rates (lb/hr, etc.) the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors determined by the Executive Secretary to give the results in the specified units of the emission limitation.

(e) Production Rate During Testing. The production rate during all compliance testing shall be no less than 90% of the maximum production achieved in the previous three (3) years.

II.B.2.b.2

**Recordkeeping:**

a. The permittee shall maintain a file of all testing and all other information required by permit provision I.S.1 and applicable portions of 40 CFR Part 60, Subparts A and Da recorded in a permanent form suitable for inspection. (40 CFR 60.7(f))

b. Documentation of the evaluated opacity measurements shall be maintained in accordance with Provision I.S.1 of this permit, including the date and time of each evaluation and the name of the person reviewing the data. If the opacity measurement exceeds the required percentage, a record of the corrective action will also be maintained. This record shall include the date of the maintenance request, the date the maintenance was performed, the type of maintenance performed, and the name of the person responsible for the maintenance. The record may reference a maintenance log if needed.

c. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the unit; or any malfunction of the air pollution control equipment. (40 CFR 60.7(b)).

II.B.2.b.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.c

Emissions of SO<sub>2</sub> shall be no greater than 0.15 lb/MMBtu heat input before modification or no greater than 0.138 lb/MMBtu after modification, based on a 30-day rolling average as determined by the arithmetic average of all hourly emission rates for the 30 successive boiler operating days for each boiler except during periods of startup, shutdown, maintenance/planned outage or when both: a) emergency conditions exist, and b) 60.46a(d) procedures are implemented. Modification is defined in the abstract of

DAQE-049-02. [Authority granted under 40 CFR 60.43a, 60.46a and R307-401-6 (BACT); condition originated in DAQE-049-02]

II.B.2.c.1

**Monitoring:**

a. The permittee shall install, calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring sulfur dioxide emissions. The permittee shall determine compliance in accordance with 40 CFR Part 60.46a, Compliance provision (subparagraph (c), (d), (e), (g) and (h)), 60.47a, Emission monitoring (subparagraph (b), (d), (e), (f), (g), (h), (i) and (j)), and 60.48a, Compliance determination procedures and methods (subparagraph (c)).

b. Each continuous emission monitoring system shall meet the following requirements:

40 CFR Part 75, Appendix A, Specification and Test Procedures

1. Installation and Measurement Location
2. Equipment Specifications (except the requirement for a low range in 2.1.1.2)
3. Performance Specifications
4. Data Acquisition and Handling Systems
5. Calibration Gas

c. The permittee shall implement a Quality Control program according to 40 CFR Part 75, Appendix B, Procedure 1, Quality Control Program and Appendix B, Procedure 2, Frequency of Testing except Procedure 2.1.5, Procedure 2.2.3 and Procedure 2.3.2, which define the out-of control periods for the daily, quarterly, semiannual and annual assessments, respectively. The following requirements shall be used to define the out-of-control criteria for the emission data:

40 CFR Part 60, Appendix F, Procedure 4.3, Criteria for Excessive Calibration Drift

40 CFR Part 60, Appendix F, Procedure 5.2, Excessive Audit Inaccuracy

40 CFR Part 60, Appendix F, Procedure 6, Calculations for CEMS Data Accuracy

II.B.2.c.2

**Recordkeeping:**

a. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by applicable portions of 40 CFR Part 60, Subparts A and Da recorded in a permanent form suitable for inspection. (40 CFR 60.7(f))

b. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the unit; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative (40 CFR 60.7(b)). (origin: 40 CFR 60.7(b) & (f) and R307-415-6a(3)(b)(ii))

II.B.2.c.3

**Reporting:**

a. The permittee shall submit excess emission reports required by 40 CFR



60.7(c) and (d) and 40 CFR 60.49a, Reporting requirements. A data assessment report required by Appendix F, Procedure 1, Section 7 to 40 CFR Part 60 shall be submitted with the excess emission report.

b. Relative Accuracy Test Audit notifications shall be made in accordance with R307-170, Continuous Emission Monitoring System Program.

c. The permittee shall submit notifications and reports to the Executive Secretary as required by R307-170, Continuous Emission Monitoring Systems Program.

d. A copy of all reports required by 40 CFR Part 60 to be submitted to the Executive Secretary (permitting authority) shall also be submitted to USEPA, Region VIII, if requested. (40 CFR 60.4 and 60.7(c))

e. The reports required in paragraphs a, b, and c above are considered prompt notification of permit deviations required in provision I.S.2.c of this permit if all information required by provision I.S.2.c is included in the report.

f. Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107.

II.B.2.d

Emissions of SO<sub>2</sub> shall be no greater than 10 percent of the potential combustion concentration based on the average inlet and average outlet SO<sub>2</sub> emissions determined as the arithmetic average of all hourly emission rates for the 30 successive boiler operating days for each boiler except during periods of startup, shutdown, maintenance/planned outage or when both: a) emergency conditions exist, and b) 60.46a(d) procedures are implemented. [Authority granted under 40 CFR 60.43a, 60.46a and R307-401-6 (BACT); condition originated in DAQE-049-02]

II.B.2.d.1

**Monitoring:**

a. The permittee shall install, calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring sulfur dioxide emissions. The permittee shall determine compliance in accordance with 40 CFR Part 60.46a, Compliance provision (subparagraph (c), (d), (e), (g) and (h)), 60.47a, Emission monitoring (subparagraph (b), (d), (e), (f), (g), (h), (i) and (j)), and 60.48a, Compliance determination procedures and methods (subparagraph (c)).

b. SO<sub>2</sub> inlet monitor shall meet the following requirements:

40 CFR Part 60, Appendix B, Specifications and Test Procedures for SO<sub>2</sub> and NO<sub>x</sub> Continuous Emission monitoring Systems in Stationary Sources

40 CFR Part 60, Appendix F, Quality Assurance Procedures

c. The permittee shall implement a Quality Control program for the SO<sub>2</sub> outlet monitors according to 40 CFR Part 75, Appendix B, Procedure 1, Quality Control Program and Appendix B, Procedure 2, Frequency of Testing except Procedure 2.1.5, Procedure 2.2.3 and Procedure 2.3.2, which define the out-of-control periods for the daily, quarterly, semiannual and annual assessments, respectively. The following requirements shall be used to define the out-of-control criteria for the emission data:

40 CFR Part 60, Appendix F, Procedure 4.3, Criteria for Excessive Calibration Drift

40 CFR Part 60, Appendix F, Procedure 5.2, Excessive Audit Inaccuracy

40 CFR Part 60, Appendix F, Procedure 6, Calculations for CEMS Data Accuracy

d. An as-fired fuel monitoring system (upstream of coal pulverizers) meeting the requirements of Method 19 (40 CFR Part 60 Appendix A) may be used as an alternative method to determine potential sulfur dioxide emissions in place of a continuous sulfur dioxide emission monitor at the inlet to the sulfur dioxide control device. (60.47a(b)(3))

II.B.2.d.2

**Recordkeeping:**

a. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by applicable portions of 40 CFR Part 60, Subparts A and Da recorded in a permanent form suitable for inspection. (40 CFR 60.7(f))

b. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the unit; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative (40 CFR 60.7(b)). (origin: 40 CFR 60.7(b) & (f) and R307-415-6a(3)(b)(ii))

II.B.2.d.3

**Reporting:**

a. The permittee shall submit excess emission reports required by 40 CFR 60.7(c) and (d) and 40 CFR 60.49a, Reporting requirements. A data assessment report required by Appendix F, Procedure 1, Section 7 to 40 CFR Part 60 shall be submitted with the excess emission report.

b. Relative Accuracy Test Audit notifications shall be made in accordance with R307-170, Continuous Emission Monitoring System Program.

c. The permittee shall submit notifications and reports to the Executive Secretary as required by R307-170, Continuous Emission Monitoring Systems Program.

d. A copy of all reports required by 40 CFR Part 60 to be submitted to the Executive Secretary (permitting authority) shall also be submitted to USEPA, Region VIII, if requested. (40 CFR 60.4 and 60.7(c))

e. The reports required in paragraphs a, b, and c above are considered prompt notification of permit deviations required in provision I.S.2.c of this permit if all information required by provision I.S.2.c is included in the report.

f. Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107.

II.B.2.e

Visible emissions shall be no greater than 20 percent opacity (six-minute average) for each boiler except for one six-minute period per hour of not more than 27 percent opacity and except during periods of

start-up, shutdown, maintenance/planned outage, or malfunction. [Authority granted under 40 CFR 60.42a(b), 60.46a(c) and R307-401-6 (BACT); condition originated in DAQE-049-02]

II.B.2.e.1

**Monitoring:**

a. The permittee shall determine compliance with the visible emission limit by periodic monitoring using a continuous opacity monitoring (COM) system installed and operated in accordance with 40 CFR 60.47a, Emission monitoring (subparagraphs (a), (e), (f), and (i)), and 60.13, Monitoring requirements (subparagraphs (e) and (h)).

b. Each continuous opacity monitoring system shall meet the following quality assurance requirements:

40 CFR 60.13, Monitoring requirements (subparagraphs (d) and (f))  
40 CFR Part 60, Appendix B, Performance Specification 1, Specifications and Test Procedures for Opacity Continuous Emission Monitoring Systems in Stationary Sources  
R307-170, Continuous Emission Monitoring System Program

c. If both Method 9 and COM data are available, the Method 9 data shall be used to determine compliance. Method 9 may also be used to determine compliance during periods when the COM is out of service.

II.B.2.e.2

**Recordkeeping:**

a. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by applicable portions of 40 CFR Part 60, Subparts A and Da recorded in a permanent form suitable for inspection. (40 CFR 60.7(f))

b. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the unit; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative (40 CFR 60.7(b)). (origin: 40 CFR 60.7(b) & (f) and R307-415-6a(3)(b)(ii))

II.B.2.e.3

**Reporting:**

a. The permittee shall submit excess emission reports required by 40 CFR 60.7(c) and (d) and 40 CFR 60.49a, Reporting requirements. A data assessment report required by Appendix F, Procedure 1, Section 7 to 40 CFR Part 60 shall be submitted with the excess emission report.

b. The permittee shall submit notifications and reports to the Executive Secretary as required by R307-13, Continuous Emission Monitoring Systems Program.

c. A copy of all reports required by 40 CFR Part 60 to be submitted to the Executive Secretary (permitting authority) shall also be submitted to USEPA, Region VIII, if requested. (40 CFR 60.4 and 60.7(c))

d. The reports required in paragraphs a, and b above are considered prompt notification of permit deviations required in provision I.S.2.c of this permit if all information required by provision I.S.2.c is included in the report.

e. Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-1-4.7.

II.B.2.f In order to demonstrate that the modification did not result in significant emissions increases, the permittee shall monitor the rolling 12-month period (that is compiled quarterly) main boilers 1&2 fuel consumption data (MMBtu/hr) and emissions from their stack flues for at least 5 years from the date the units begin fully using the modifications as regular operation. If the permittee fails to comply with the annual reporting requirements or if the submitted information indicates that emissions have increased above the significant emission increases as a consequence of the change, The permittee will be required to obtain a PSD permit for these modifications at that time. [Authority granted under R307-101-2 & R307-405-6; condition originated in DAQE-049-02]

II.B.2.f.1 **Monitoring:** Within the first 20 days of the first month of each calendar quarter, the emissions of all pollutants regulated under Prevention of Significant Deterioration of Air Quality (PSD) program shall be calculated. Emissions total shall be calculated for each calendar quarter and added to the previous 3 quarters emissions data resulting a 12-month rolling total. Records of NOx and SO2 shall be obtained through the use of a CEM. Records of PM10 shall be based on annual stack tests. Records for the rest of pollutants shall be based on the EPA's Compilation of Air Pollutant Emission Factors (AP-42), industry specific published emission factors (such as Electric Power Research Institute, Edison Electric Institute or source own testing).

II.B.2.f.2 **Recordkeeping:** Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.

II.B.2.f.3 **Reporting:** In addition to the reporting requirements in section I of this permit, the result of monitoring shall be submitted to the executive secretary on an annual basis

II.B.3 **Conditions on Emergency Diesel Generators (Emission unit #49):**

II.B.3.a The units shall be operated on an emergency basis only, except for routine engine maintenance and testing. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]

II.B.3.a.1 **Monitoring:** An operation log shall be used to record the unit operation time and the reasons to run the units.

II.B.3.a.2 **Recordkeeping:** Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.

II.B.3.a.3 **Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.3.b Visible emissions shall be no greater than 20 percent opacity except for start-up or shutdown and except for operation not exceeding 3 minutes in any hour. [Authority granted under R307-401-6(1) [BACT], R307-201-1(4) & R307-201-1(7); condition originated in DAQE-049-02]

- II.B.3.b.1                      **Monitoring:**              Opacity observations of emissions shall be conducted annually in accordance with 40 CFR Part 60, Appendix A, Method 9.
- II.B.3.b.2                      **Recordkeeping:**       Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.
- II.B.3.b.3                      **Reporting:**              There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.4                      **Conditions on Diesel Driven Fire Pump 1B (Emission unit #54):**

II.B.4.a                      The units shall be operated on an emergency basis only, except for routine engine maintenance and fire system maintenance. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]

- II.B.4.a.1                      **Monitoring:**              An operation log shall be used to record the unit operation time and the reasons to run the units.
- II.B.4.a.2                      **Recordkeeping:**       Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.
- II.B.4.a.3                      **Reporting:**              There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.4.b                      Visible emissions shall be no greater than 20 percent opacity except for start-up or shutdown and except for operation not exceeding 3 minutes in any hour. [Authority granted under R307-401-6(1) [BACT], R307-201-1(4) & R307-201-1(7); condition originated in DAQE-049-02]

- II.B.4.b.1                      **Monitoring:**              Opacity observations of emissions shall be conducted annually in accordance with 40 CFR Part 60, Appendix A, Method 9.
- II.B.4.b.2                      **Recordkeeping:**       Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.
- II.B.4.b.3                      **Reporting:**              There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.5                      **Conditions on Diesel Driven Fire Pump 1C (Emission unit #55):**

II.B.5.a                      The units shall be operated on an emergency basis only, except for routine engine maintenance and fire system maintenance. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]

- II.B.5.a.1                      **Monitoring:**              An operation log shall be used to record the unit operation time and the reasons to run the units.
- II.B.5.a.2                      **Recordkeeping:**       Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.
- II.B.5.a.3                      **Reporting:**              There are no reporting requirements for this provision except those specified

in Section I of this permit.

II.B.5.b Visible emissions shall be no greater than 20 percent opacity except for start-up or shutdown and except for operation not exceeding 3 minutes in any hour. [Authority granted under R307-401-6(1) [BACT], R307-201-1(4) & R307-201-1(7); condition originated in DAQE-049-02]

II.B.5.b.1 **Monitoring:** Opacity observations of emissions shall be conducted annually in accordance with 40 CFR Part 60, Appendix A, Method 9.

II.B.5.b.2 **Recordkeeping:** Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.

II.B.5.b.3 **Reporting:** There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.6 **Conditions on Auxiliary Boilers (Emission unit #56 and 57):**

II.B.6.a Emissions of NO<sub>x</sub> shall be no greater than 0.35 lb/MMBtu heat input and 58 lb/hr for each boiler. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]

II.B.6.a.1 **Monitoring:** Stack testing shall be performed as follows:

(a) Frequency. Whenever the accumulated fuel oil consumption of one boiler exceeds 50,000 barrels, a stack test shall be performed on that boiler.

(b) Notification. At least 30 days before the test, the source shall notify the Executive Secretary of the date, time, and place of testing and provide a copy of the test protocol. The source shall attend a pretest conference if determined necessary by the Executive Secretary.

(c) The emission sample point shall be designed to conform to the requirements of 40 CFR Part 60, Appendix A, Method 1.

(d) Methods to be used:

(1) To determine stack volumetric flow rate - 40 CFR Part 60, Appendix A, Method 2 or 2C.

(2) To test for NO<sub>x</sub> emissions - 40 CFR Part 60, Appendix A, Method 7, 7A, 7B, 7C, 7D, or 7E.

(e) Calculations. To determine mass emission rates (lb/hr) the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors. To determine the emission rate (lb/MMBtu) the appropriate procedures in Method 19 shall be used.

(f) Production Rate During Testing. The production rate during all compliance testing shall be no less than 90% of the maximum production.

II.B.6.a.2 **Recordkeeping:** Results of monitoring shall be maintained as described in Provision I.S.1 of this

permit.

- II.B.6.a.3                      **Reporting:**                      Results of required stack testing shall be submitted to the Executive Secretary within 45 days of completion of the testing. The submittal shall clearly identify results and indicate compliance status. The annual compliance certification required by Provision L in Section I of this permit shall use the most recent test results as a basis for stating compliance status for this limitation.
- II.B.6.b                      Emissions of PM<sub>10</sub> shall be no greater than 0.1 lb/MMBtu heat input and 20 lb/hr for each boiler. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]
- II.B.6.b.1                      **Monitoring:**                      Stack testing shall be performed as follows:
- (a) Frequency. Whenever the accumulated fuel oil consumption of one boiler exceeds 50,000 barrels, a stack test shall be performed on that boiler.
- (b) Notification. At least 30 days before the test, the source shall notify the Executive Secretary of the date, time, and place of testing and provide a copy of the test protocol. The source shall attend a pretest conference if determined necessary by the Executive Secretary.
- (c) The emission sample point shall be designed to conform to the requirements of 40 CFR Part 60, Appendix A, Method 1.
- (d) Methods to be used:
- (1) To determine stack volumetric flow rate - 40 CFR Part 60, Appendix A, Method 2 or 2C.
- (2) To test for PM<sub>10</sub> emissions - 40 CFR Part 60, Appendix A, Method 201a or 201b
- (e) Calculations. To determine mass emission rates (lb/hr) the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors. To determine the emission rate (lb/MMBtu) the appropriate procedures in Method 19 shall be used.
- (f) Production Rate During Testing. The production rate during all compliance testing shall be no less than 90% of the maximum production.
- II.B.6.b.2                      **Recordkeeping:**                      Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.
- II.B.6.b.3                      **Reporting:**                      Results of required stack testing shall be submitted to the Executive Secretary within 45 days of completion of the testing. The submittal shall clearly identify results and indicate compliance status. The annual compliance certification required by Provision L in Section I of this permit shall use the most recent test results as a basis for stating compliance status for this limitation.
- II.B.6.c                      Emissions of SO<sub>2</sub> shall be no greater than 0.69 lb/MMBtu heat input and 100 lb/hr for each boiler.

[Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]

|            |                       |  |
|------------|-----------------------|--|
| II.B.6.c.1 | <b>Monitoring:</b>    | <p>Stack testing shall be performed as follows:</p> <p>(a) Frequency. Whenever the accumulated fuel oil consumption of one boiler exceeds 50,000 barrels, a stack test shall be performed on that boiler.</p> <p>(b) Notification. At least 30 days before the test, the source shall notify the Executive Secretary of the date, time, and place of testing and provide a copy of the test protocol. The source shall attend a pretest conference if determined necessary by the Executive Secretary.</p> <p>(c) The emission sample point shall be designed to conform to the requirements of 40 CFR Part 60, Appendix A, Method 1.</p> <p>(d) Methods to be used:</p> <p>(1) To determine stack volumetric flow rate - 40 CFR Part 60, Appendix A, Method 2 or 2C.</p> <p>(2) To test for SO<sub>2</sub> emissions - 40 CFR Part 60, Appendix A, Method 6, 6A, 6B, 6C, or Method 8.</p> <p>(e) Calculations. To determine mass emission rates (lb/hr) the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors. To determine the emission rate (lb/MMBtu) the appropriate procedures in Method 19 shall be used.</p> <p>(f) Production Rate During Testing. The production rate during all compliance testing shall be no less than 90% of the maximum production.</p> |
| II.B.6.c.2 | <b>Recordkeeping:</b> | Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.  |
| II.B.6.c.3 | <b>Reporting:</b>     | Results of required stack testing shall be submitted to the Executive Secretary within 45 days of completion of the testing. The submittal shall clearly identify results and indicate compliance status. The annual compliance certification required by Provision L in Section I of this permit shall use the most recent test results as a basis for stating compliance status for this limitation.   |
| II.B.6.d   |                       | Combined annual fuel oil consumption shall not exceed 50,000 barrels. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]  |
| II.B.6.d.1 | <b>Monitoring:</b>    | Fuel oil consumption shall be determined by using the fuel oil totalizing meter.   |
| II.B.6.d.2 | <b>Recordkeeping:</b> | Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.  |
| II.B.6.d.3 | <b>Reporting:</b>     | There are no reporting requirements for this provision except those specified in Section I of this permit.   |



|            |                       |   |
|------------|-----------------------|---|
| II.B.6.e   |                       | Sulfur content of the fuel oil combusted shall be no greater than 0.58 percent by weight. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]   |
| II.B.6.e.1 | <b>Monitoring:</b>    | Compliance with this limitation shall be determined either by testing each fuel delivery for the sulfur content or by inspection of the fuel sulfur-content specifications provided by the vendor in purchase records or by direct vendor certification that all deliveries have met the sulfur content limit. Sulfur content in either instance shall be determined in accordance with ASTM-4294, or equivalent.   |
| II.B.6.e.2 | <b>Recordkeeping:</b> | Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.   |
| II.B.6.e.3 | <b>Reporting:</b>     | There are no reporting requirements for this provision except those specified in Section I of this permit.  |
| II.B.6.f   |                       | Visible emissions shall be no greater than 20 percent opacity for each boiler. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]  |
| II.B.6.f.1 | <b>Monitoring:</b>    | Opacity observations of emissions shall be conducted monthly in accordance with 40 CFR Part 60 Appendix A, Method 9 after the boilers are placed back in service.   |
| II.B.6.f.2 | <b>Recordkeeping:</b> | Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.   |
| II.B.6.f.3 | <b>Reporting:</b>     | There are no reporting requirements for this provision except those specified in Section I of this permit.  |
| II.B.7     |                       | <b><u>Conditions on Coal Conveyers (Emission unit #58):</u></b>   |
| II.B.7.a   |                       | Visible emissions shall be no greater than 20 percent opacity. [Authority granted under 40 CFR Part 60 Subpart Y; condition originated in DAQE-049-02]  |
| II.B.7.a.1 | <b>Monitoring:</b>    | A visual observation of each emission point shall be made at least once each month. If visible emissions are noted, a Method 9 observation shall be conducted to determine the percent opacity or maintenance shall be performed on the affected unit to correct the problem.   |
| II.B.7.a.2 | <b>Recordkeeping:</b> | A log of the visual inspections shall be maintained in accordance with Provision I.S.1 of this permit, including the date and time of each inspection and the name of the person making the inspection. If an excess visible emission is indicated, a notation of the resulting maintenance activity will also be made in the log, and shall include the date of the maintenance request, the date the maintenance was performed, the type of maintenance performed, and the name of the person responsible for the maintenance. The visual inspection log may reference a maintenance log if needed. |
| II.B.7.a.3 | <b>Reporting:</b>     | There are no reporting requirements for this provision except those specified in Section I of this permit.  |

II.B.8                    **Conditions on Dust Collector Group 1 (Emission unit #Group 1):**

II.B.8.a                    The differential pressure across each dust collector shall be no greater than 12 inches of water gage and no less than 0.5 inches of water gage. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]

II.B.8.a.1                    **Monitoring:**                    The permittee shall check the pressure drop across the baghouse or to the atmosphere (whichever is specified by the manufacturer) monthly to make sure that the pressure drop is in the range. If differential pressure is less than 2 inches or greater than 10 inches of water gage, work orders will be written to investigate. Dust collector may run in the 0.5 to 2 or 10 to 12 range if reason is known. Preventative maintenance shall be conducted quarterly on each baghouse.

II.B.8.a.2                    **Recordkeeping:**                    Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.

II.B.8.a.3                    **Reporting:**                    There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.9                    **Conditions on Dust Collector Group 2 (Emission unit #Group 2):**

II.B.9.a                    Visible emissions shall be no greater than 20 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-049-02]

II.B.9.a.1                    **Monitoring:**                    A visual observation of each emission point shall be made at least once each month. If visible emissions are noted, a Method 9 observation shall be conducted to determine the percent opacity or maintenance shall be performed on the affected unit to correct the problem.

II.B.9.a.2                    **Recordkeeping:**                    A log of the visual inspections shall be maintained in accordance with Provision I.S.1 of this permit, including the date and time of each inspection and the name of the person making the inspection. If an excess visible emission is indicated, a notation of the resulting maintenance activity will also be made in the log, and shall include the date of the maintenance request, the date the maintenance was performed, the type of maintenance performed, and the name of the person responsible for the maintenance. The visual inspection log may reference a maintenance log if needed.

II.B.9.a.3                    **Reporting:**                    There are no reporting requirements for this provision except those specified in Section I of this permit.

II.C.                    **Emissions Trading.** (R307-415-6a(10))  
Not applicable to this source.

II.D.                    **Alternative Operating Scenarios.** (R307-415-6a(9))  
Not applicable to this source.

II.E.                    **Source-specific Definitions.** The following definitions apply to the permittee. They include terms not defined in state or federal rules or clarify or expand on existing definitions.

- II.E.1      *Startup.* Startup begins when the forced draft fans are turned on with the intent to bring the unit on line to generate power and ends when the baghouse is in service. Startup of the baghouse must begin immediately when the inlet temperature(s) of the baghouse(s) reach 210EF and less than 10 percent of the boiler's heat input is being furnished by fuel oil.
- II.E.2      *Shutdown.* Shutdown begins when the load is reduced with the intent of bringing the unit off line and ends when the fuel and forced draft fans are turned off.
- II.E.3      *Downtime.* Downtime is that time between the end of shutdown and the beginning of startup.
- II.E.4      *Maintenance Outage.* The removal of a unit from service availability to perform work on specific components that can be deferred beyond the end of the next weekend, but requires the equipment be removed from service before the next planned outage. Typically, a Maintenance Outage may occur anytime during the year, have a flexible start date, and may or may not have a predetermined duration.
- II.E.5      *Planned Outage.* The removal of a unit from service availability for inspection and/or general overhaul of one or more major equipment groups. This outage usually is scheduled well in advance.

### **Section III: PERMIT SHIELD**

The following requirements have been determined to be not applicable to this source in accordance with Provision I.M, Permit Shield:

III.A.      **40 CFR, Part 60, Subpart Kb (NSPS/ Volatile Organic Liquid Storage Vessels)**

This regulation is not applicable to the permitted source (Source-wide) because Construction commenced in 1981 and Subpart Kb applies only to tanks constructed, reconstructed, or modified after July 23, 1984.

III.B.      **40 CFR Part 60, Subparts D (Standards of Performance for New Stationary Sources for Fossil-Fuel-Fired Steam Generators)**

This regulation is not applicable to the Main Boilers (Emission unit # 1 and 2) because 40 CFR 60.40b(e) excludes Subpart D facilities from the scope of the Subpart Db.

III.C.      **40 CFR, Part 60, Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills)**

This regulation is not applicable to the permitted source (Source-wide) because the landfill does not receive household waste as defined at 40 CFR 60.751 which could cause the landfill to become a municipal solid waste landfill.

III.D.      **40 CFR, Part 60, Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants)**

This regulation is not applicable to the permitted source (Source-wide) because the on-site nonmetallic mineral processing facilities (limestone preparation) commenced construction in 1981, and has not been reconstructed or modified. 40 CFR 60.670(e) applies only to facilities constructed after August 31, 1983.

III.E.      **40 CFR, Part 60, Subpart NNN (Standards of Performance for Volatile Organic Compounds from Distillation Operations)**

This regulation is not applicable to the permitted source (Source-wide) because the standards apply to Synthetic Organic Chemical Manufacturing Industry distillation operations and do not apply to the on-site solvent recovery distiller.

III.F. **40 CFR Part 60, Subparts Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units)**

This regulation is not applicable to the Auxiliary Boilers (Emission unit # 56 and 57) because construction commenced in April 1984 and Subpart Db applies to steam generators constructed after June 19, 1984, but on or before June 19, 1986.

III.G. **40 CFR, Part 60, Subpart Ka (Standards of Performance for Storage Vessels for Petroleum Liquids)**

This regulation is not applicable to the permitted source (Source-wide) because petroleum liquids do not include Nos. 2 through 6 fuel oils as specified in ASTM D396-78 according to Subpart 60.111a. The fuel oil tanks store Fuel oil Nos. 2 through 6. The gasoline tanks are exempted to Subpart Ka due to their small size.

III.H. **40 CFR Part 60, Subparts Db (Standards of Performance for New Stationary Sources for Industrial-Commercial-Institutional Steam Generating Units)**

This regulation is not applicable to the Main Boilers (Emission unit # 1 and 2) because 40 CFR 60.40b(e) excludes Subpart Da facilities from the scope of the Subpart Db.

III.I. **40 CFR, Part 60, Subpart K (Standards of Performance for Storage Vessels for Petroleum Liquids)**

This regulation is not applicable to the permitted source (Source-wide) because construction commenced in 1981 and Subpart K applies only to tanks constructed, reconstructed, or modified between June 11, 1973 and prior to May 19, 1978.

III.J. **40 CFR Part 60, Subpart Cc (Emission Guidelines and Compliance Times for Municipal Solid Waste Landfill)**

This regulation is not applicable to the permitted source (Source-wide) because the landfill does not receive household waste as defined at 40 CFR 60.30c which could cause the landfill to become a municipal solid waste landfill.

## **Section IV: ACID RAIN PROVISIONS.**

IV.A. **Utah Acid Rain Program Authority.**

Authority to implement the Acid Rain Program is contained in R307-417, *Acid Rain Requirements*, and R307-415-6(a)(4), *Standard permit requirements* [for operating permits].

IV.B. **Permit Requirements.**

IV.B.1 The designated representative of the source and each affected unit at the source shall:

IV.B.1.a Submit a complete Acid Rain permit application (including a compliance plan) under R307-417 and 40 CFR Part 72 in accordance with the deadlines specified in 40 CFR 72.30; and

IV.B.1.b Submit in a timely manner any supplemental information that the Executive Secretary determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;

IV.B.2 The owners and operators shall:

IV.B.2.a Operate each affected unit at the source in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the Executive Secretary; and

IV.B.2.b Have an Acid Rain Permit.

IV.C. **Sulfur Dioxide Requirements**

IV.C.1 The owners and operators of each affected unit at the source shall:

IV.C.1.a Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and

IV.C.1.b Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.

IV.C.2 Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.

IV.C.3 An affected unit shall be subject to the requirements under Provision IV.C.1. of the sulfur dioxide requirements as follows:

IV.C.3.a Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or

IV.C.3.b Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR Part 75, an affected unit under 40 CFR 72.6(a)(3).

IV.C.4 Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.

IV.C.5 An allowance shall not be deducted in order to comply with the requirements under Provision IV.C.1.a. of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.

IV.C.6 An allowance allocated by the Administrator, USEPA, under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

IV.C.7 An allowance allocated by the Administrator, USEPA, under the Acid Rain Program does not constitute a property right.

IV.D. **Nitrogen Oxides Requirements.**

IV.D.1 Effective January 1, 2000, emissions of NO<sub>x</sub> from each boiler (1SGA and 2SGA) shall be no greater than 0.50 lb/MMBTU heat input on an annual basis until January 1, 2008, provided the owners and operators comply with the provisions for early election for Group 1, Phase II boilers set forth in 40 CFR 76.8. If the owners and operators fail to comply with 40 CFR 76.8, emissions of NO<sub>x</sub> shall be no greater than 0.46 lb/MMBTU heat input on an annual basis according to 40 CFR 76.7.

- IV.D.2 A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO<sub>x</sub> as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii). Boilers 1SGA and 2SGA are currently operating under a Phase I Acid Rain Permit for NO<sub>x</sub> Early Election issued by EPA on April 16, 1997.
- IV.D.3 An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the Executive Secretary shall terminate the plan. The termination shall take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative shall submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO<sub>x</sub> for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO<sub>x</sub> for Phase II units with Group 1 boilers under 40 CFR 76.7.
- IV.D.4 In lieu of complying with the applicable NO<sub>x</sub> emission limitation in 40 CFR 76.5, 76.6, or 76.7, any affected units subject to such emission limitation, under control of the same owner or operator, and having the same designated representative may average their NO<sub>x</sub> emissions under an averaging plan approved under 40 CFR 76.11. The owner or operator of a Phase II unit approved for early election may not incorporate the unit into an averaging plan prior to January 1, 2000 (40 CFR 76.8(a)(5)).
- IV.E. **Monitoring Requirements.**
- IV.E.1 The owners and operators and, to the extent applicable, designated representative of each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR Parts 74, 75, and 76.
- IV.E.2 The emissions measurements recorded and reported in accordance with 40 CFR Part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- IV.E.3 The requirements of 40 CFR Parts 74 and 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.
- IV.F. **Recordkeeping and Reporting Requirements.**
- IV.F.1 Unless otherwise provided, the owners and operators for each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator, USEPA, or Executive Secretary:
- IV.F.1.a The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

- IV.F.1.b All emissions monitoring information, in accordance with 40 CFR Part 75;
- IV.F.1.c Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
- IV.F.1.d Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- IV.F.2 The designated representative of each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR Part 72 Subpart I and 40 CFR Part 75.
- IV.G. **Excess Emissions Requirements.**
- IV.G.1 The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan to the Administrator, USEPA, as required under 40 CFR Part 77.
- IV.G.2 The owners and operators of an affected unit that has excess emissions in any calendar year shall:
- IV.G.2.a Pay without demand the penalty required, and pay upon demand the interest on that penalty, to the Administrator, USEPA, as required by 40 CFR Part 77; and
- IV.G.2.b Comply with the terms of an approved offset plan, as required by 40 CFR Part 77.
- IV.H. **Liability.**
- IV.H.1 Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or a written exemption under R307-16, 40 CFR 72.7 or 40 CFR 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- IV.H.2 Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- IV.H.3 No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- IV.H.4 Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- IV.H.5 Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- IV.H.6 Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO<sub>x</sub> averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or

operators or the designated representative and that is located at a source of which they are not the owners and operators, owners or operators, or the designated representative.

- IV.H.7 Each violation of a provision of 40 CFR Parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.
- IV.H.8 The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.
- IV.I. **Effect on Other Authorities.** No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:
- IV.I.1 Except as expressly provided in Title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative from compliance with any other provision of the Act, including the provisions of Title I of the Act relating to applicable National Ambient Air Quality Standards or the Utah State Implementation Plan;
- IV.I.2 Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- IV.I.3 Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- IV.I.4 Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- IV.I.5 Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.



## REVIEWER COMMENTS

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This operating permit incorporates all applicable requirements contained in the following documents:

DAQE-049-02      dated      January 11, 2002

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**1:      Comment on an item originating in DAQE-049-02 and 40 CFR 60 Subpart Da regarding Main Boilers (Unit 1 and 2):**

NOX standard: NOX limit in the AO DAQE-049-02 is 0.50 lb/MMBtu.

NSPS standards (40 CFR 60.44a(a)(1) and (2)) for NOX are:

0.60 lb/MMBtu heat input for bituminous coal

0.50 lb/MMBtu heat input for subbituminous coal

65 percent reduction of the potential combustion concentration.

40 CFR Part 60.44a(c) has a formula to calculate the standard for the mixed fuel. It is difficult to practically enforce such limit. Intermountain Power Service Corporation (IPSC) submitted a letter to the Division of Air Quality and willing to accept the NOX limit of 0.50 lb/MMBtu.

40 CFR 60.46a(a) states that compliance with the nitrogen oxides emission limitation under 60.44a(a)(1) constitutes compliance with the percent reduction requirements for NOX under 60.44a(a)(2). [Comment last updated on 4/10/2002]

**2:      Comment on an item originating in BAQE-049-02 and 40 CFR 60 Subpart Da regarding Main Boilers (Unit 1 and 2):**

SO2 standard: NSPS standard (40 CFR 60.43a(a)(2)) for SO2 are:

0.60 lb/MMBtu heat input and

30 percent of the potential combustion concentration.

Since SO2 emission limitation determined in the AO (0.15 lb/MMBtu) and 10 % of potential combustion concentration are more stringent than NSPS standard, the NSPS standards are subsumed in the same operating permit condition. [Comment last updated on 4/10/2002]

**3: Comment on an item originating in 40 CFR Part 72, 73, 75, 76, 77 and 78 regarding Main Boilers (Unit 1 and 2):**

Acid Rain Program Affected Units: Unit #1 Coal-Fired Boiler and Unit #2 Coal-Fired Boiler are the affected units under the Acid Rain Program as set forth in 40 CFR Parts 72, 73, 75, 76, 77, and 78. The Acid Rain Boiler ID #'s are 1SGA for Unit #1 Coal-Fired Boiler and 2SGA for Unit #2 Coal-Fired Boiler, respectively. Acid Rain Program requirements are contained in Section IV of the permit. All requirements of Section IV are enforceable upon the issue date of the permit unless otherwise specified in the condition (e.g. some SO<sub>2</sub> and NO<sub>x</sub> requirements). [Comment last updated on 1/02/1998]

**4: Comment on an item originating in The operating permit application regarding permitted source (Source-wide):**

NSPS Standards on the Fuel Oil Tanks: Construction for all the oil tanks was commenced in 1981. 40 CFR Kb, Standard of Performance for Volatile Organic Liquid Storage Vessels applies to storage vessel constructed after July 23, 1984. Therefore, this standard does not apply. [Comment last updated on 1/02/1998]

**5: Comment on an item originating in The operating permit application regarding permitted source (Source-wide):**

Cooling Towers: The cooling towers on-site do not use chromium and there are no unit specific requirements for these emission units. [Comment last updated on 1/02/1998]

**6: Comment on an item originating in DAQE-049-02 regarding permitted source (Source-wide):**

List of the emission units in AO DAQE-049-02: IPSC submitted a Notice of Intent dated June 16, 1997 regarding solvent washers and the Guzzler Truck Dust Collector. These emission units have been in existence at IPSC since it came on-line. PM<sub>10</sub> emissions from the Guzzler bag house are 0.06 tons per year (tpy). Total VOC emissions from the solvent washers are 1.01 tpy. Emissions from these units are insignificant. Therefore, BACT emission limits are not warranted. The units usually are listed in AO so that the Division of Air Quality knows their existence. These units are addressed in Section II.A. Emission Units permitted to Discharge Air Contaminants by this permit. The 20% opacity was identified as a general applicable requirement for Guzzler baghouse. [Comment last updated on 4/10/2002]

**7: Comment on an item originating in DAQE-049-02 regarding Auxiliary Boilers (Unit 56 and 57):**

NSPS Applicability Determination: The equipment is permitted in DAQE-049-02. Field erection of the boiler was in April 1984 according to the letter regarding Intermountain Power Project (IPP) Auxiliary Boilers dated January 26, 1984 from the source. The boilers are permitted prior to initial installation. 40 CFR Part 60 Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, applies to steam generating units that commence construction after June 19, 1984. Therefore, Subpart Db does not apply to these auxiliary boilers. [Comment last updated on 4/10/2002]

**8: Comment on an item originating in DAQE-049-02 regarding Auxiliary Boilers (Unit 56 and 57):**

Stack Test Requirement: The auxiliary boilers are not used, nor is it anticipated that they will be used in the future. However, they are still listed in the permit so that they can be placed back in service if necessary. The stack test frequency is set as follows:

Whenever the accumulated fuel oil consumption of one boiler exceeds 50,000 barrels, a stack test shall be performed on that boiler.

The trigger level was set at 50,000 barrels because there is an annual consumption limit for these two boilers in the unit of Barrel.

The Division permitting, compliance and legal staff are in agreement that such trigger level could satisfy the intent of R307-165-1. [Comment last updated on 4/10/2002]

**9: Comment on an item originating in DAQE-049-02 and 40 CFR 60 Subpart Da regarding Main Boilers (Unit 1 and 2):**

PM10 standard: PM10 limit in AO, DAQE-049-02 is 0.02 lb/MMBtu.

NSPS standards (40 CFR 60.42a(a)(1) and (2)) for particulate matter are:

0.03 lb/MMBtu heat input and one percent of the potential combustion concentration. Since more than 90% of PM is PM10, the PM limit of 0.03 lb/MMBtu is equal to the PM10 limit of 0.027 lb/MMBtu

40 CFR 60.46a states that compliance with the particulate matter emission limitation under 60.42a(a)(1) constitutes compliance with the percent reduction requirements for particulate matter under 60.42a(a)(2).

Since the particulate matter emission limitation determined by BACT in the AO is more stringent than the NSPS standard, the NSPS standard is subsumed in the same operating permit condition. [Comment last updated on 4/10/2002]

**10: Comment on an item originating in 40 CFR Part 76 regarding Main Boilers (Unit 1 and 2):**

Early Election of NOX Reduction: Acid Rain Boilers, 1SGA and 2SGA are currently operating under a Phase I Acid Rain permit issued by EPA for the NOX Early Election Program according to 40 CFR 76.8. This permit will remain in force through December 31, 1999 at which time the NOX reduction provisions in Section IV of this Phase II permit will become effective (January 1, 2000). [Comment last updated on 1/02/1998]

**11: Comment on an item originating in DAQE-049-02 regarding permitted source (Source-wide):**

Use of a Fugitive Dust Control Plan to provide a more enforceable condition for compliance with R307-205: Many older Approval Orders historically established opacity limits for fugitive dust, however the Utah rule (R307-205) requires that fugitive dust be minimized. The rule does set opacity limits for fugitive emissions. DAQ has required sources to develop and implement Fugitive Dust Control Plans to minimize fugitive dust, and used opacity in conjunction with recordkeeping as a measure of plan effectiveness and whether the plan was being implemented. Opacity then became an indicator of compliance rather than a direct measure of compliance. Nonetheless, using visible emission observation methods such as Methods 9, 22, and even the proposed 203 series may not always be the most appropriate and practically enforceable means to determine compliance. As a result, DAQ has required definitive and site-specific visual measures that are more appropriate for a given source of dust. Visual measures are suggested by the permittee as part of its dust control plan and not necessarily opacity observations. The permittee's selection of visual measures is subject to State approval. Visual measures can produce more reliable results because the Division anticipates that they will yield more meaningful data on status of dust control than opacity observation and the end result would be more effective dust control than could be obtained by enforcing on opacity alone. In addition, visual measures are anticipated to be more meaningful to State enforcement staff than opacity observation. Division compliance/enforcement staffs have fully participated in the development of the language on fugitive dust. [Comment last updated on 4/10/2002]

**12: Comment on an item originating in DAQE-049-02 regarding permitted source (Source-wide):**

Use of source definitions to improve enforceability: Several definitions are required for this source to more precisely define specific circumstances described in 40 CFR Part 60 during which excess emissions may be generated but may not constitute a violation. These definitions include and expand upon the 40 CFR 60.2 definitions of startup and shutdown and have been determined to be more stringent than the Part 60 definitions. Part 60 also requires sources to operate and maintain equipment in a manner consistent with good pollution control practice for minimizing emissions (40 CFR 60.11(d)). In order to meet this requirement, sources must perform both scheduled and unscheduled maintenance. These maintenance periods are called planned outages and maintenance outages within the industry. The Division of Air Quality and Utah Air Quality Board have required the electric utility plants to submit reports on these maintenance activities to better ensure compliance with Part 60 requirements. The term downtime is also defined as the period between startup and shutdown during which the maintenance is performed and during which excess emissions may be generated. These emissions may not be a violation provided the source adheres to good pollution control practices as required by 40 CFR 60.11(d). These definitions only apply to the main boilers. [Comment last updated on 4/10/2002]

**13: Comment on an item originating in 40 CFR 60 Subpart Y regarding permitted source (Source-wide):**

New Source Performance Standard for Coal Preparation Plants: This NSPS is applicable to this source according to the applicability criteria in 40 CFR 60.250(a) since it processes more than 200 tons per day, has a coal crusher, and was constructed after October 24, 1974. The standard that applies is the 20% opacity limit in 60.252(c) for coal processing, conveying equipment, storage systems, or coal transfer and loading system that connect to the coal crushers. The affected facilities are conveyers #1A, 1B, 2A, 2B, 4, 5A, 7, 8, 9A, 9B, 15A, 15B, 18A, 18B and 30. [Comment last updated on 1/02/1998]

**14: Comment on an item originating in DAQE-049-02 regarding Main Boilers (Unit 1 and 2):**

Opacity Limits: 40 CFR Part 60 Subpart Da 60.42a(a) sets opacity limits of 20 percent except for one six-minute period per hour during which opacity shall not exceed 27 percent. Condition #10.B in AO, DAQE-749-01 requires the source to meet an opacity limit of 20 percent. Exception was not specified in AO. However, condition #12, DAQE-749-01 states that the opacity can be determined by 40 CFR 60, Appendix A, Method 9. When COM is required to determine the compliance, exception to 20 % opacity allowed by NSPS should apply. [Comment last updated on 4/10/2002]

**15: Comment on an item originating in DAQE-049-02 regarding Main Boilers (Unit 1 and 2):**

Excess Emission Reports Used for Prompt Permit Deviation Reporting: Section I.S.2.c. requires prompt reporting of all permit deviations and prompt is defined as 14 days. The boiler stacks have been equipped with highly reliable Acid Rain CEM systems required by Part 75. These systems include data handling systems that record and store data for very frequent intervals than can be used for determining excess emissions as defined in Part 60. Because of the reliability and frequency that data is collected, deviation reports at 14 day intervals would be burdensome to analyze. Utah DAQ currently employs electronic reporting for CEM sources and automated analysis software to determine periods of noncompliance. These reports are received quarterly. More frequent deviation reporting for emissions addressed by excess emission reports would not enhance environmental protection. Therefore, prompt is considered to be the date when Part 60 excess emission reports (EER) are required for units and pollutants included in the EERs. However, quarterly EER are not intended to be a substitute or replacement for the breakdown reports required under R307-107. R307-107 still applies. [Comment last updated on 4/10/2002]

**16: Comment on an item originating in DAQE-049-02 regarding Main Boilers (Unit 1 and 2):**

Requirement for Low Range on Part 75 CEM Used for Part 60 Monitoring: Acid Rain monitors are being used to monitor compliance with Part 60 Subpart Da emission limits. The equipment specification in Part 75, Appendix A, Section 2.1.1.2 requires that the monitor have a low range that is not necessary to determine compliance with the Part 60 limits. Therefore, low range is not required for the purposes of Part 60 monitoring. The monitors must still have a low range capability for Section IV, Acid Rain compliance. [Comment last updated on 4/10/2002]

**17: Comment on an item originating in 40 CFR Part 60 Subpart Da and 40 CFR Part 75 regarding Main Boilers (Unit 1 and 2):**

Periodic Monitoring for SO<sub>2</sub> and NO<sub>x</sub> Limits: The Stationary Source Compliance Division (SSCD) of the U.S. Environmental Protection Agency issued a Memorandum, Use of Acid Rain CEMS as NSPS CEMS, on September 22, 1993. SSCD determined that since the CEMS requirements of 40 CFR Part 75 are equivalent to or more stringent than the requirements of 40 CFR Part 60, EPA can accept Acid Rain CEMS as NSPS CEMS provided that the utility demonstrates compliance with all applicable NSPS requirements. This policy was used to develop monitoring for this permit condition, however Part 60 and Part 75 requirements were compared in detail to ensure the most stringent criteria was incorporated into the permit condition. The following describes the rationale for the monitoring in this permit condition:

Subparagraph a identifies the applicable procedures for demonstrating compliance according to 40 CFR Part 60Da.

Subparagraph b requires the use of a Part 75 compliance monitoring system to measure 40 CFR Part 60Da regulated emissions. The Part 75 system hardware requirements are clearly more stringent and comprehensive than Part 60 CEM requirements and do not warrant detailed analysis.

Subparagraph c sets forth the CEM quality assurance program. The quality assurance programs did require detailed analysis to compare rule stringency. Utility industry representatives and the Division of Air Quality researched the quality assurance and quality control requirements for the CEMS by 40 CFR Part 75, Part 60 Subpart Da and D, and Part 51 Appendix P. The results are contained in the attached table and include brief justification notes on the most demanding requirement. In addition, there are some QA/QC criteria required only by Part 75. Therefore, quality assured data as required by Part 75 can fulfill the requirements by Part 60. However, since the monitors are being used to fulfill Part 60 requirements, the monitor out-of-control criteria for Part 60 is incorporated in the condition rather than the Part 75 criteria.

Part 60 and Part 75 have different recordkeeping requirements, but the Part 75 data system is capable of providing the necessary emissions data. All additional recordkeeping is drawn from the other applicable rules.

Part 60 Subpart Da, D and Part 75 have different reports due to different emission standards and limitations. The emission reports for Part 60 and Part 75 will not be combined, and the permittee shall prepare separate reports. [Comment last updated on 1/02/1998]

**18: Comment on an item originating in 40 CFR Part 60 Subpart Da regarding Main Boilers (Unit 1 and 2):**

Periodic Monitoring for PM: 40 CFR 60.47a and 48a only require initial compliance testing for PM, and no frequency for the PM mass limit testing is specified. The previous stack test results are as follows:

|         |                      |                         |
|---------|----------------------|-------------------------|
| Unit 1: | the year of the test | test results (lb/MMBtu) |
|         | 1996                 | 0.0099                  |
|         | 1991                 | 0.0065                  |
|         | 1986                 | 0.012                   |
| Unit 2: | the year of the test | test results (lb/MMBtu) |
|         | 1996                 | 0.0074                  |
|         | 1991                 | 0.0051                  |
|         | 1986                 | 0.0137                  |

The test results were well below the limit (0.02 lb/MMBtu).

This permit requires a stack test every year plus periodically monitoring of stack opacity. The annual stack tests by themselves do not provide data at a frequency that would be required to demonstrate continuous compliance for this source. Compliance may be inferred, however, on a more frequent basis if the source demonstrates that it operates and maintains the pollution control equipment in a manner consistent with good air pollution control. Although IPSC monitors stack opacity, differential pressure, etc. periodically, direct correlations of these parameters with the PM limit are not available. IPSC proposed to use daily opacity average as an indicator for the performance of the baghouse. By evaluating daily opacity data, the potential operation problems can be identified. For example, a gradual increase in stack opacity will be realized as the bags develop holes or fail. The permit set the 15 % opacity as a threshold to initiate immediate corrective maintenance activity. The annual stack test in conjunction with the monitoring the opacity is considered fulfill the periodical monitoring requirement of R307-415-6(c). [Comment last updated on 9/05/2001]

**19: Comment on an item originating in 40 CFR Part 60 Subpart OOO regarding permitted source (Source-wide):**

Applicability of 40 CFR Part 60 Subpart OOO: The effective date for 40 CFR Part 60 Subpart OOO is after August 31, 1983. Intermountain Power Service Corporation commenced construction in 1980. Therefore, Subpart OOO does not apply to the limestone production line (crushers, grinding mills, screening operations, bucket elevators, belt conveyors, bagging operations, storage bins, and enclosed truck and railcar loading stations). [Comment last updated on 1/02/1998]

**20: Comment on an item originating in this permit regarding permitted source (Source-wide):**

Group of the Dust Collectors: The dust collectors are divided into two groups. Group 1 includes dust collectors with outlet concentration limits. Group 2 includes all dust collectors and has the same opacity limit. Group 1 dust collectors are shown in Attachment I. [Comment last updated on 1/06/1998]